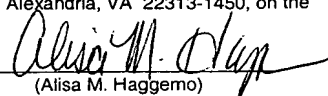


I hereby certify that this correspondence is being deposited with the U.S. Postal Service with sufficient postage as First Class Mail, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Dated: November 12, 2004 Signature: 

(Alisa M. Haggemo)

Docket No.: 65856-0052
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:
Al C. Stine et al.

Application No.: 10/629,818

Confirmation No.: 9026

Filed: July 29, 2003

Art Unit: 3681

For: AUTOMATIC RANGE UP-SHIFT
CONTROL AND METHOD OF
OPERATION

Examiner: D. Wright

**COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE UNDER 37 CFR
§1.104(E)**

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

Applicant has received the Examiner's Statement of Reasons for Allowance with the August 16, 2004 Notices of Allowance and Allowability regarding the above-identified application. Entry of the Statement into the record should not be construed as any agreement with or acquiescence in the reasoning stated by the Examiner. Each of the claims stands on its own merits and is patentable because of the combination it recites and not because of the presence or absence of any one particular element. Applicant agrees with the Examiner's conclusions regarding patentability, without necessarily agreeing with or acquiescing in the Examiner's reasoning.

The Examiner's Statement was not prepared by Applicant and only contains the Examiner's possible positions in one or more reasons for allowability. Thus, any interpretation with respect to the Examiner's Statement of Reasons for Allowance should not be imputed to the Applicant.

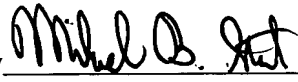
Application No.: 10/629,818

Docket No.: 65856-0052

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-0013, under Order No. 65856-0052 from which the undersigned is authorized to draw.

Dated: November 12, 2004

Respectfully submitted,

By  _____

Michael B. Stewart

Registration No.: 36,018

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